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April 24, 2012

Dear David:

Defenders of Wildlife appreciates the opportunity to provide the following recommendations regarding the DRECP Baseline Biology Report released March 27. We understand that producing the document required a huge effort on the part of the REAT agencies and DRECP consultants and appreciate the comprehensiveness of the document. Our comments, suggestions and recommendations are intended to increase the overall robustness of the Plan in order to ensure it effectively characterizes the various environmental, physical and biological conditions that support the covered resources in the DRECP.

Thank you for your continued leadership and dedication to the development of this Plan,

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Summary of Recommendations

- 1. Increase collaboration with other organizations, institutions, agencies on gathering the best available information, data and science on desert resources.** DRECP has a tremendous opportunity to build upon concurrent studies that have produced highly applicable maps and models that can greater improve the planning process. These include by are not limited to: TNC's West Mojave Assessment, UCSB's Solar Compatibility Model, USFWS's Desert tortoise habitat linkage study, CBI's Wind, Wings and Wilderness project, and SC Wildlands' numerous studies on linkages.
- 2. Further expand upon recommendations from the Independent Science Advisors including, but not limited to, the need for planning at the sub-regional level and the importance of building upon existing planning documents.**
- 3. Include information and an evaluation of the current data and information on how future climate change will impact the region.**
- 4. Incorporate new vegetation map information as soon as possible to improve the accuracy and defensibility of BGOs, reserve design development, least impact lands assessments, and species habitat models.**

The following are more detailed comments on the information included in the following Sections of the Baseline Biology Report and Memo Transmittal:

Memo Transmittal: Additional Data Summary Table (Table 1)

The DRECP should take full advantage of the numerous studies and analyses that pertain to the California desert region. It is critical that the DRECP build upon existing sophisticated studies and that these studies be incorporated into the foundational understanding of the region that is described in the Baseline Biology Report. This table is useful in understanding how and when data sources are being incorporated and used; however, the presentation of the information and how it is being used could be improved and clarified. For example, we recommend the table include separate columns for the data name, source and description. In most cases the data source is included however in some instances it is unclear (e.g. radar data for bird usage and migratory pathways).

Additionally the list of ongoing research projects should not be slated to be incorporated into the DRECP only in the adaptive management and monitoring plan. Many of these ongoing research projects have produced sophisticated and highly applicable interim products that are currently ready for use. For example, the UCSB project on the Cumulative Biological Impacts of Large-scale Solar has produced a model for mapping lands with higher compatibility with solar development based on data related to land disturbance (fire, agriculture), development (urban, roads, irrigation canals, etc), and other land uses (e.g. mining). This approach was recommended by the Independent Science Advisors, was vetted by independent conservation planners and geographers, refined and made easily usable for a variety of purposes.

Table 1 does not include Conservation Biology Institute's Wind, Wings and Wilderness project in the Tehachapi and southern Sierra Mountains. The four million acre project study area overlaps with the DRECP and includes the areas that are currently targeted for a large amount of wind development. The goal of the project is to conduct a regional analysis of the southern Sierra and Tehachapi Mountains to describe potential impacts of wind energy facilities on biological resources, including landscape connectivity and integrity, and to map areas where wind energy development presents low, medium and high potential for conflict with vulnerable species and habitats. The data produced from this project is extremely applicable to the DRECP and should be incorporated into reserve design planning process as soon as possible.

Table 1 does not include the West Mojave Assessment that is currently underway by the The Nature Conservancy. This study focuses on finding the least conflict areas for solar development – specifically in the West Mojave – by identifying and classifying avoidance criteria (e.g. key habitats, linkages, protected areas) and land use disturbance (e.g. roads, agriculture, etc). This study should be incorporated into the reserve design planning process for the DRECP as soon as possible.

Table 1 does not include the recent Desert tortoise habitat linkage study completed by the U.S. Fish and Wildlife Service and submitted with their comments to the BLM on the Supplement to the Draft Solar PEIS. This study uses the USGS habitat suitability model for Desert tortoise to

link pairs of ACECs/DWMA's using least cost path analysis. This study should be considered in designing the reserve to ensure habitat connectivity and gene flow for the Desert tortoise.

Memo Transmittal: Consideration and Response to ISA Recommendations (Table 2)

We appreciate the effort the DRECP has made to follow the recommendations contained in the *Recommendations of Independent Science Advisors for California DRECP* report (November 2010), as this document is an extremely valuable resource. The recommendation to “subdivide the plan area into ecologically relevant subunits” is one that deserves further attention. We recommend further investigating the possibility of planning for renewable energy development using a sub-region approach and support the recommendation from the ISA to “divide the planning area into several regions or planning units that are both ecologically relevant and potentially useful for dealing with the likely clustering of renewable energy developments in different regions.” (ISA report; p. 65) Once the large planning area is sub-divided, it will be easier to characterize the quality and quantity of data and information available in each sub-region. Planning for renewable energy development should first take place in those areas where data at the appropriate resolution is currently available. In this way, the plan can focus development on those areas where there is the least uncertainty and provide greater permit assurances for covered species.

While we appreciate that the DRECP has provided summaries of existing conservation plans and how they apply to the proposed covered species, we recommend giving more attention to the existing planning documents when delineating conservation areas and mitigation actions, as these plans have benefited from significant scientific input over many years of planning for conservation of the California deserts. For more information on these previous plans, please refer to our comments on the DRECP Biological Goals and Objectives submitted on April 13, 2012.

Section 2 – Environmental Setting

This section should include a section on the effects of projected climate change in the California desert region, as this information is critical to understanding the future habitat requirements of the covered species throughout the permit term. There are numerous climate models available for assessing and evaluating future climate trends in the region and these models and data should be incorporated into the Baseline Biology Report.

Section 3 – Physical and Ecological Processes

Please consider and incorporate additional linkage information into Chapter 3, as follows:

1. USFWS. 2012. Comments on the Supplement to the Draft Solar PEIS. Washington, DC. Note: These comments include science-based habitat linkages for the Desert tortoise based on the USGS Desert tortoise habitat model, least-cost movement pathways and contiguous high-quality habitat that is permeable to Desert tortoises (mentioned above as well).
2. Penrod, K. et al. 2005. South Coast Missing Linkages Project: A Linkage Design for the San Bernardino-Granite Connection. South Coast Wildlands, Idyllwild, CA.

3. Penrod, K., et al. 2006. South Coast Missing Linkages Project: A Linkage Design for the Peninsular-Borrogo Connection. South Coast Wildlands, Idyllwild, CA.
4. Penrod, K., et al. 2003. South Coast Missing Linkages Project: A Linkage Design for the Tehachapi Connection. Unpublished Report. South Coast Wildlands, Monrovia, CA.

With regard to the recent Desert Linkages report by Science and Collaboration for Connected Wildlands (Penrod, et al. 2012) we believe it needs to be applied in a careful manner recognizing that it was intended to identify the least cost pathways between “Landscape Blocks” which include areas excluded from industrial energy projects, namely parks, wilderness units and military installations. These landscape blocks do not include other lands supporting relatively intact natural communities which are also occupied by the species addressed in the Desert Linkages report.

We recommend that the baseline habitat condition for lands within the planning area include the high value natural landscapes identified by 1) The Nature Conservancy in its Mojave Desert Ecological Assessment (Randall, J. M., S.S. Parker, J. Moore, B. Cohen, L. Crane, B. Christian, D. Cameron, J. MacKenzie, K. Klausmeyer and S. Morrison. 2010. *Mojave Desert Ecoregional Assessment*. Unpublished Report. The Nature Conservancy, San Francisco, California. 106 pages + appendices), and 2) Conservation Biology Institute in its conservation framework for the Sonoran Desert (Conservation Biology Institute. 2009. *A Framework for Effective Conservation Management of the Sonoran Desert in California*. Prepared for The Nature Conservancy).

Section 4 – Natural Communities and Biological Setting

We support the use of the National Vegetation Classification System (NVCS) nomenclature as the basis for the DRECP land cover map. It should be noted that NVCS vegetation Alliance and Association categories are the most effective vegetation mapping units to use in conservation planning and reserve design. We strongly recommend using this level of vegetation information where available in the Plan Area as the basic reserve design unit. The Macro-group and Division-level of vegetation information is not useful for conservation planning for many of the covered species in the DRECP. As it is available, we urge the DRECP to incorporate finer resolution data from both the central and west Mojave mapping projects as soon as it is available to refine the habitat suitability models.

In regards to mapping of lower biological value lands and agriculture, we urge the DRECP to consult with the University of California, Santa Barbara’s Biogeography Lab as they have spent considerable time and effort developing a sophisticated spatial model to map lands with lower potential conflict between renewable energy development and biological resources. This mapping effort, described above, called the “Solar Compatibility Model,” is an interim product of a larger project that aims to assess the cumulative impacts of large-scale solar energy and includes data related to fire history, agricultural history, disturbed lands, road density, mining

activities. The model incorporates both off-site and on-site impacts in an attempt to find those places that have the potential to be more compatible with solar resources.

In addition, The Nature Conservancy, as mentioned above, is currently working on an assessment of the West Mojave to find places with lowest conflict between solar development and biological resources. This is a congruent and compatible study with UCSB's because it models and maps lands at the scale of a sub-region, whereas UCSB's study covered almost the whole plan area.

Both The Nature Conservancy and UCSB should be contacted so that the DRECP can collaborate and benefit from these highly applicable and useful studies.

Section 5 – Species Considered for Coverage

For various species addressed in chapter 5, it appears only recent occurrences, namely those after 1990 area considered recent and therefore given special emphasis in delineating suitable habitats for these species. This is an arbitrary date and may result in ignoring or deemphasizing habitats that have remained largely in the same condition for long periods of time and remain suitable for supporting the covered species. We recommend that all verified species occurrences be considered in delineating suitable habitats in areas where natural communities remain in an intact condition.

The following are specific recommendations/comments on individual covered species:

Bald Eagles: We have repeatedly recommended that wintering Bald eagles known to occur at Haiwee Reservoir be included in the species occurrence database. Haiwee Reservoir is one area where CDFG conducts or conducted wintering Bald eagle surveys.

Burrowing owl: Please indicate that Burrowing owls also utilize natural cavities along wash banks, and abandoned Kit fox dens, and abandoned Desert tortoise burrows in some cases. They do not rely exclusively on ground squirrel burrows.

Gila woodpecker: Please update occurrences of this species in the Chuckwalla Valley north of Desert Center in Microphyll Woodland Communities – see biological resources reports for the Desert Sunlight and Desert Harvest solar projects. For the Palo Verde Mesa area see the reports associated with the proposed Rio Mesa solar project SW of Blythe, CA.

Golden eagle: Please add recent mortality at the Pine Tree Wind Farm in the Southern Sierra Nevada where 8 Golden eagles have been killed in the past two years. Please update Golden eagle occurrences with recent surveys in support of environmental studies at solar and wind project areas including occurrences in the Cady Mountains, Daggett Ridge, Nopah, Resting Spring and Coyote Mountains, and Southern Sierra Nevada. BLM occurrence data from 1977-78 and subsequent monitoring reports should be included because Golden eagles have a high fidelity to nesting territories that last for multiple generations or hundreds of years.

Inyo California towhee: Please clarify if any of the habitat for this species or documented occurrences occur within the plan area. It appears the occupied habitats in the Argus Range and Surprise Canyon (Panamint Range) are outside but adjacent to the plan area boundary.

Yellow-billed cuckoo: Please check with the Audubon Society, including the Kern River Preserve, regarding observations of this species along Kelso Creek.

White-tailed kite: White-tailed kites have been observed feeding at seasonal wetlands on the western shore of Koehn Dry Lake in the late 1970s (Aardahl, personal observation).

Willow flycatcher: Please update the occurrences to include observations at Cottonwood Creek near Jawbone Canyon in support of the biological resources report for the North Sky River Wind Project, and observations made under BLM contract in 2002 at various locations including Indian Wells Canyon, Sand Canyon and Nine-mile Canyon, all along the eastern Sierra Nevada in riparian habitats.

Nelson's bighorn sheep: Please check the State status – CDFG lists it as fully protected unless otherwise subject to controlled hunting in certain ranges.

Mohave ground squirrel: Again we recommend using BLM's MGS occurrence data from studies it conducted or sponsored from 1974 through 1980, and the species occurrence and habitat data in the West Mojave Plan Appendix M. These documented occurrences should be used in delineating habitat suitability. Please note that the BLM's MGS occurrence data from its 1980 field study provides relative densities of MGS at 22 locations based on systematic surveys.

We recommend that habitat suitability or rating for this species within its range be based solely on the USGS habitat model under development and documented occurrences of this species include the studies noted above by BLM. The arbitrary date of 1990 or 1998 to distinguish between recent and historic occurrences should be abandoned.